

2. Policy Context and Update

- 2.1. This chapter gives a brief overview of the planning policy context for the proposed development, and also provides an 'update' where policy guidance has altered or progressed. This chapter is not intended to provide a full summary of the relevant planning policy, which can be reviewed in the planning statements that accompanied the Planning Applications, as updated here.

The Aviation White Paper

- 2.2. The Government's White Paper, the 'Future of Air Transport' (referred to as the Aviation White Paper) provides the strategic framework for the development of air travel over the next 30 years. The key objective identified in the White Paper is the need to balance a rise in the affordability of air travel against the protection of the environment. The White Paper acknowledges that the failure to allow for growth in air travel would have significant economic impacts at a regional and national level.
- 2.3. The White Paper supports a strategy for a 'balanced approach', which recognises the need to expand existing airports rather than building new ones. It advises that the expansion of existing regional airports must be incorporated in the relevant policy documents, in order to achieve planned and sustainable growth. Existing airport operators are expected to produce master plans or, where appropriate, to update existing master plans to take account of the conclusions on future development set out in the White Paper.
- 2.4. The White Paper acknowledges that the difficulties of attaining a balance are most acute in the South East. Over half of the 200 million journeys through UK airports in 2003 were through airports in the South East, and this trend is forecast to continue. The White Paper identifies an urgent need for additional runway capacity in the South East region, to be provided where possible by making the best use of existing runways, although the need for a new runway in the region has also been identified. The majority of the additional capacity needed will be concentrated around the larger airports in the region, with Stansted identified as the preferred location for a new runway.

The Future of Air Transport Progress Report, December 2006

- 2.5. A progress report on the Aviation White Paper was published by the Government in December 2006. The report states that the Government remains committed to the long-term strategy for the development of air travel set out in the 2003 Aviation White Paper. The progress report sets out the Government's commitment to accommodating air

transport growth, which is shown to be increasing. The Government cites continued international competitiveness, trade and freight transport, aviation's direct contribution to economic development and people's aspiration to travel as drivers for the increasing demand for air travel.

- 2.6. The report sets out steps that seek to mitigate the environmental impact of an increase in air travel in recognition of the environmental challenges of airport operation, thus continuing the balanced approach set out in the Aviation White Paper.

National Planning Policy Guidance

- 2.7. The development is considered against national planning policy guidance, within either Planning Policy Guidance notes (PPG) or Planning Policy Statements (PPS), which are replacing the existing PPGs. The PPGs and PPSs provide guidance to local authorities and others on planning policy and the planning system. The guidance also explains the relationship between different planning policies. National guidance must be taken into account by Councils during the preparation of development plans, and during the consideration of Planning Applications.

Regional and Strategic Planning Policy Guidance

- 2.8. The Planning Applications will be considered against Regional Planning Guidance for the South East (RPG9) and the draft Regional Spatial Strategy (RSS) for the South East, which will replace RPG9 in due course.
- 2.9. The Regional Spatial Strategy (RSS) will be contained within the South East Plan (SEP), and will contain spatial strategy for the region up to 2026. The SEP will perform the same function as RPG9 and will build upon many of the central themes within existing national and regional guidance such as promoting brownfield development, regeneration and sustainable transport. It is also an aspiration of the plan to consider how planning policy can assist with improving health and education in the region.
- 2.10. At the time the Planning Applications were submitted to Shepway District Council in December 2006, the Examination in Public (EiP) of selected issues arising out of the Draft South East Plan was being held by a panel of Members. This took place between the end of November 2006 and the end of March 2007.
- 2.11. On the 6 August 2007, the Panel's report of the RSS for the South East of England was submitted to the Secretary of State. In respect of the two relevant policies referred to in the December 2006 planning statements, the Panel has recommended that:

- Policy T9 is amended to:

“ensure that land at Gatwick Airport is safeguarded for a possible

new runway after 2019, to add a reference to Airport Masterplans, and to set targets to ensure a shift to more sustainable forms of travel to and from airports. (paras 9.33-9.35)”

- Despite Kent County Council and Shepway District Council making representations for LAA to be reinstated into policy EK4A, no change has been recommended to policy EKA4.
- 2.12. The Panel recognised that the potential role of LAA aroused strongly held views with some 150 responses to the initial consultation on the draft plan in favour of expansion with over 400 against.
- 2.13. The Panel also noted that support for the potential of the airport for smaller scale operations (2mppa) was included in the consultation draft of the South East Plan, but had been withdrawn from the submission draft because “this scale of airport was deemed by the Regional Assembly to be a local issue”.
- 2.14. The Panel concluded that specific reference to the potential expansion of LAA in the South East Plan would be inappropriate for the following reasons (with brief LAA response indicated):

- 1) *There are other small scale airports in the region not mentioned and there must be a cut off somewhere.*

The fact that other small airports in the Region are not mentioned is not a reason in itself for deleting reference to LAA. In accordance with the policies and objectives of the Government’s Aviation White Paper, LAA has developed a long term masterplan for the airport, of which the current Planning Applications represent phase 1. If implemented, the current proposals will accommodate increased airport capacity. This will not only boost tourism in the Sub Region and act as a catalyst for inward investment, but it will help to alleviate pressure on existing London airports. In any event, it is recognised that this reason is not an indicator of a lack of RSS Panel support for the proposed expansion.

- 2) *There is no support given to expansion of Lydd (LAA) in the Regional Economic Strategy (RES) which according to SEEDA only refers to existing regional airports.*

This is essentially the same reason as 1 – it is considered there must be a cut off somewhere. The same response as to 1 is repeated. Development at LAA would assist in facilitating the RES’s objectives of helping to maintain the global competitiveness of the South East; of lifting the prospects of underperforming areas, communities and individuals; and of pursuing the key principles of sustainability. This issue is explored in

more detail in the assessment on Socio- economic impacts contained in this Supplementary Environmental Information. In any event, it is recognised that this reason is also not an indicator of a lack of RSS Panel support for the proposed expansion.

- 3) *There is no specific support for the expansion of Lydd airport (LAA) in the Air Transport White Paper, only a factual statement that the operators have plans for development. The general support for development of regional airports, subject to relevant environmental constraints, relates to all airports in the preceding section, including London City and Southampton airports.*

Chapter 11 of the White Paper deals with the expansion of airports in the South East Region. One of the main conclusions of this chapter is:

“We [the Government] support, in principle, development of smaller airports in the south east to meet local demand subject to relevant environmental considerations”

The White Paper then goes on to provide specific support for the expansion of LAA, where it states:

“The operators of Southend, Lydd and Manston argue that their airports could grow substantially and each has plans for development. The potential of other airports, including Shoreham and Biggin Hill, should not be overlooked. We consider that all these airports could play a valuable role in meeting local demand and could contribute to regional economic development. In principle we would support their development, subject to relevant environmental considerations”.

We consider that this part of the White Paper does express support for the expansion of LAA and that the RSS Panel report is simply incorrect in relation to this reason. In any event, it is recognised that this reason is also not an indicator of a lack of RSS Panel support for the proposed expansion.

- 4) *We are unconvinced as to the extent to which the airport could act as a major economic driver since there would be significant environmental and transportation implications arising from any attempt to attract ancillary activities such as airline engineering, particularly where there are similar facilities already available at nearby Kent International Airport.*

This reason is manifestly incorrect and based on a complete lack of evidence. No assessment to determine the environmental and transport implications of airline engineering has been carried out by the Panel to enable such a conclusion to be

formulated. In addition, the Planning Applications are for a runway extension and terminal building respectively, whose purposes are to increase the passenger throughput capacity of LAA. Therefore, the Panel's comment which relates to ancillary activities such as airline engineering has no bearing on the current Planning Applications.

- 5) *KCC's suggestion to reinstate support for 2mppa, and to make support for Lydd Airport (LAA) and the expansion of Kent International Airport subject to 6 criteria similar to those set out in the last Structure Plan would turn part of Policy EKA4 into a detailed development control policy which would be inappropriate in our view.*

The RSS should follow the approach taken in the White Paper, whereby 'in principle' support is given to further expansion of LAA, subject to relevant environmental considerations. In any event, it is recognised that this reason is also not an indicator of a lack of RSS Panel support for the proposed expansion.

- 6) *Having no mention of Lydd airport (LAA) in the Plan does not indicate that growth will be prevented. Instead, the case for expansion will be determined through the development control process where proper testing can take place, including a full Environmental Impact Assessment.*

It is agreed that the appropriate place for the expansion of the airport to be determined is through the development control process. Whilst this point is accepted, it is considered that the RSS for the South East should reflect the national level. The Government's Aviation White Paper provides the strategic framework for the development of air travel over the next 30 years. It encourages the development of existing airport facilities in the South East (including LAA) away from the main airports at Heathrow, Gatwick and Stansted. This is not reflected in the draft RSS. In any event, it is recognised that this reason is also not an indicator of a lack of RSS Panel support for the proposed expansion.

- 2.15. The Secretary of State is in the process of considering the Panel's report along with all the previously submitted representations and will make a decision on whether any changes need to be made. The Secretary of State aims to publish any proposed modifications by the end of 2007, at which stage there will be a further period of public consultation on the proposed changes.
- 2.16. As outlined above, the draft RSS in its current form does not properly reflect, or build upon, current National Strategic Planning Policy for the development of air travel over the next 30 years, as set out in the Aviation White Paper. This identifies the need for additional runway capacity in the South East Region and makes reference to LAA and

other small airports as being important to meeting local demand and contributing to regional economic development. The approach to airport development in the South East is no doubt being closely scrutinised by the Secretary of State. Further representations by LAA and others will also be made at the appropriate time.

- 2.17. In the meantime, it is clear that the RSS Panel does not wish to restrict development at LAA – rather it does not yet recognise the regional significance of the airport expansion plan. Whilst LAA considers this a flawed approach, there is nothing in the RSS Panel report which militates against the proposed development which is the subject of the Planning Applications.

The Development Plan

Kent and Medway Structure Plan (KSMP), 2006

- 2.18. The KSMP was adopted in July 2006 and provides a sound and up-to-date strategic planning framework for the County of Kent.
- 2.19. The KSMP acknowledges the important part that LAA plays in serving business needs and providing opportunities for recreational flying. It recognises that enhancing the airport's existing facilities would improve the airport's ability to cater for general aviation and passenger traffic and capture scheduled and charter business.
- 2.20. Policy SH1 'Shepway' of the KSMP states that:

“Proposals to strengthen the rural economy of Romney Marsh should be concentrated at New Romney and Lydd. Proposals to retain and strengthen the current uses at Lydd Airport should be pursued.”

- 2.21. Policy TP25 states that the expansion of aviation at LAA will also be supported. Proposals related to the development of the airport will be assessed for acceptability against various criteria as listed in the Policy.

Shepway District Local Plan Review, 2006

- 2.22. The Shepway District Local Plan Review was adopted in March 2006, and provides planning guidance and direction for the Shepway District to 2011. The Council confirms in paragraph 11.41 that it supports development that strengthens the airport function at LAA. This paragraph then goes on to say that the County Council also supports the growth of services at Lydd Airport and considers that it could support increased aviation activity on a scale of 1 to 2 million passengers per year.

2.23. Policy TR15 of the Shepway District Plan states that:

*“The District Planning Authority will **permit** proposals for the expansion of facilities at Lydd airport directly related to the commercial and recreations flying use provided that there would be no significant impact upon the internationally important wildlife communities in the Lydd/Dungeness area. Regard will also be given to the likely effect of proposals on other special features in the area, particularly the power station”. (our emphasis).*

2.24. Therefore, the recently adopted Local Plan states that the Council will permit the expansion of LAA provided there would be no significant impact on the internationally important wildlife communities.

Compliance with Aviation and Planning Policy

2.25. It is clear from the above analysis that proposals for the expansion of facilities at LAA are supported by the Government’s Aviation White Paper and in the relevant policies contained in the Kent and Medway Structure Plan 2006 and the Shepway District Local Plan Review 2006.

Comparison with Bournemouth Airport development.

2.26. Since the submission of the Planning Applications in December 2006, there has been a determination of a planning application at Bournemouth International Airport which provides a useful comparison in some respects:-

Bournemouth International Airport

2.27. Application ref: 8/07/0065 was submitted to Christchurch Borough Council on 15 February 2007 for the refurbishment and extension of the existing passenger terminal facilities, construction of new car parks, landscaping, bus turning circle and new vehicular access onto Parley Lane.

2.28. The Council resolved to grant planning permission at Planning Committee on 21 June 2007, subject to completion of legal agreement and referral to The Government. Office for the South West (GOSW).

2.29. The application was not ‘called in’ by GOSW for determination by the Secretary of State and, therefore, the Council, following completion of the Section 106 agreement, granted planning permission on 31 August 2007.

2.30. The comparison between Bournemouth Airport and LAA is illustrated in the table below.

Criteria	Bournemouth	LAA
Total Airport area	336 hectares (three sectors)	132 hectares
Application Site Area	13.35 hectares	19 hectares
Existing terminal building	5,430 sqm	Approx 4,000 sqm
Proposed terminal building	8,994 sqm	7,380 sqm
Existing runway length	2,271m	1,505m
Proposed runway length	2,271m	1,799m
Existing car parking	2,177 (plus 139 staff spaces)	223
Proposed car parking	5,721	860 (includes long and short stay car parking and staff parking)
On Site Designations	Green Belt, SSSI and SPA	SSSI
Proposed employees	1060	300
Current throughput	0.9 mppa	Approximately 3,000 ppa
Predicted throughput (2015)	3 mppa	500,000 ppa
Aircraft capability	Boeing 737, Airbus 319's	Boeing 737, Airbus A319's
Nearest settlements	Hurn Village 1.5 km to SE West Parley 3 km to west	Lydd 2 km to west
Off site designations	SSSI, SPA, SAC, SNCI, Ramsar Sites, New Forest National Park	Dungeness SAC (to the east) Dungeness to Pett level SPA (to the east) National Nature Reserve (to the SE) Roadside Nature Reserve (to the SW) SNCI (to the W) Proposed RAMSAR site

2.31. Both airports are located in essentially open countryside, outside the confines of the built up settlement. In the case of Bournemouth Airport, this open countryside is designated as the South East Dorset Green Belt.

2.32. The nearest settlement to Bournemouth Airport is Hurn village, approximately 1.5 km to the south east. The larger suburban development of West Parley is 3 km to the west. The airport, however, is also located close to the built up areas of Bournemouth and Christchurch to the west, south and east of the airport.

2.33. In the case of LAA, the nearest settlement is at Lydd which is 2 km to the west. The airport is positioned in a more isolated location, some distance from the built up area of Folkestone.

2.34. Whilst Bournemouth Airport is substantially larger in area, it can be divided into three sectors with only the southern sector comprising the operational element of the airport.

- 2.35. The northernmost sector of Bournemouth Airport consists of heathland and river corridor predominately designated as a Site of Special Scientific Interest (SSSI) and a Special Protection Area (SPA) providing an important habitat for breeding birds. There are also SACs, SNCIs and Ramsar sites mainly to the north and east of the airport. The New Forest National Park boundary lies to the north east of the airport.
- 2.36. Prior to making a decision on the Bournemouth Airport proposals, Christchurch Borough Council, as the 'competent authority', carried out an Appropriate Assessment of the proposals under the Habitat Regulations. The assessment concluded that having regard to the proposed mitigation, monitoring and review measures, there would not be any adverse affect arising from the proposals.
- 2.37. Similarly, some of the airport land at LAA (adjacent to the existing runway) lies partly within, and adjacent to the Dungeness, Romney Marsh and Rye Bay SSSI. LAA also lies within the vicinity of the Dungeness Special Area of Conservation (SAC), the Dungeness to Pett Level SPA and a proposed Ramsar site.
- 2.38. Following consultation with Natural England, LAA has provided Shepway District Council with four Statements to Inform, which will allow Shepway as the competent authority to carry out the necessary Appropriate Assessments in respect of the proposed new terminal building and runway extension.
- 2.39. Bournemouth airport has been experiencing rapid growth in recent years with passenger numbers increasing from 271,000 passengers per annum (ppa) in 2000 to 494,000 (ppa) in 2004 to the current level of 920,000 (ppa).
- 2.40. Whilst current passenger numbers at LAA are more modest at only 3,000 ppa, the existing airport infrastructure is capable of accommodating up to 300,000 ppa. Unless brought under planning control, this growth would be unregulated by Shepway District Council with no planning requirement on LAA to mitigate against the impacts of expansion, and no planning controls over night time flying.
- 2.41. The recent planning permission issued by Christchurch Borough Council addresses Bournemouth airport's needs up to 2015. It will allow the airport to accommodate up to 3 million passengers per annum, to be achieved by an extension to the existing passenger terminal facilities and substantial extensions to the existing car parking facilities.
- 2.42. The new terminal building at LAA will provide facilities for processing up to 500,000 passengers per annum. The annual throughput of passengers at LAA will, therefore, represent only 17% of the airport passenger capacity at Bournemouth airport.